

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

INNOVATIONS IN MEMORY LLC,

Plaintiff,

v.

CISCO SYSTEMS, INC.,

Defendant.

Case No. 2:24-cv-00360-JRG
(Lead Case)

JURY TRIAL DEMANDED

INNOVATIONS IN MEMORY LLC,

Plaintiff,

v.

INTERNATIONAL BUSINESS MACHINES
CORPORATION,

Defendant.

Case No. 2:24-cv-00296-JRG
(Member Case)

JURY TRIAL DEMANDED

**JOINT MOTION FOR ENTRY OF ORDER FOCUSING
PATENT CLAIMS AND PRIOR ART**

Plaintiff Innovations In Memory LLC (“IIM”) and Defendant International Business Machines Corporation (“IBM”) jointly submit their proposed Order Focusing Patent Claims and Prior Art (“Focusing Order”). The parties have met and conferred and agree that the Focusing Order will assist in focusing the patent claims and prior art in this case. The Parties’ proposed Focusing Order is attached as Exhibit A.

The Parties respectfully request that the Court enter the proposed Focusing Order attached as Exhibit A.

Dated: December 19, 2024

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Respectfully submitted,

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CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel has meet and conferred and agreed that this is a joint motion.

/s/ Brett E. Cooper
Brett E. Cooper

CERTIFICATE OF SERVICE

I certify that this document is being served upon counsel of record on December 19, 2024 via electronic service.

/s/ Brett E. Cooper
Brett Cooper